

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

IN RE:

DARYL HANS SORENSEN, II

Debtor.

**BK. No: 13-bk-00247
Chapter 7**

**MOTION FOR ORDER AUTHORIZING REDEMPTION;
DECLARATION OF DARYL HANS SORENSEN, II
IN SUPPORT THEREOF**

Daryl Hans Sorensen, II (“Debtor”), through his attorney, David M. Jecklin, in support of this Motion for an Order Authorizing Redemption, respectfully represents as follows:

1. The Debtor filed Chapter 7 Bankruptcy on February 28, 2013.
2. On or about June 2, 2008, the Debtor purchased a Kirby sweeper from United Consumer Financial Services, 865 Bassett Road, Westlake, Ohio 44145. As part of the same transaction, Creditor retained a purchase money security interest in the Kirby sweeper (Goods).
3. The Debtor purchased the Goods primarily for personal use.
4. The current fair market value of the Goods is at the most \$200.00.
5. The Creditor has already received more than the value of the Goods.
6. No previous application has been made to this Court for the judgment now sought.
7. The holder of the lien is neither infant, incarcerated convict, nor incompetent person.

8. The lien in question was obtained and perfected subsequent to November 6, 1978.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order authorizing Debtor to redeem the Goods for \$200.00 from Creditor's lien and granting such other and further relief to which Debtor may be entitled.

Dated: April 1, 2013

GIANOLA, BARNUM, WIGAL & LONDON, L.C.

s/ David M. Jecklin
David M. Jecklin, Esquire
1714 Mileground
Morgantown, WV 26505
WV. Bar No. 9678
(304) 291-6300

CERTIFICATE OF MAILING

I, David M. Jecklin, certify that on the 1st day of April 2013, I served the Debtor's Motion for Order of Redemption by e-filing and mailing a true copy by United States First Class Mail, postage prepaid, to United Consumer Financial Services, 865 Bassett Road, Westlake, Ohio 44145 and United Consumer Financial Services c/o Bass & Associates, 3936 E. Ft. Lowell Road, Ste. 200, Tucson, Arizona 85712.

s/ David M. Jecklin
David M. Jecklin, Esquire
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DECLARATION OF DARYL HANS SORENSEN, II

I, Daryl Hans Sorensen, II, declare as follows:

1. I am the Debtor in the above captioned case ("Debtor"). I submit this Declaration in support of my Motion for Order Authorizing Redemption.

2. On February 28, 2013, I filed Chapter 7 Bankruptcy.

3. On or about June 2, 2008, I purchased electronic and miscellaneous goods from United Consumer Financial (Creditor) 865 Bassett Road, Westlake, Ohio 44145. As part of the same transaction, Creditor retained a purchase money security interest in the Kirby sweeper (Goods).

4. I purchased the Goods for personal use.

5. I believe that the fair market value of the Goods is at the most \$200.00.

6. I believe that what I have already paid exceeds the fair market value of the Goods.

7. If necessary, I am ready, willing and able to pay Creditor an additional \$200.00 in order to redeem the Goods.

I declare under penalty of perjury that the foregoing is true and correct, is of my own personal knowledge, and if called as a witness we could and would testify competently.

s/ Daryl Hans Sorensen, II
DARYL HANS SORENSEN, II